



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

TJS:TAD  
F. #2013R00381

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 10, 2014

By Email and ECF

Ephraim Savitt, Esq.  
260 Madison Avenue  
22nd Floor  
New York, NY 10016

Re: United States v. Bebars Baslan  
Criminal Docket No. 13-220 (RJD)

Dear Mr. Savitt:

Pursuant to our obligations under Giglio v. United States, 405 U.S. 150 (1972), the government hereby discloses the following information regarding the confidential informant named Jack. Most if not all of the information summarized herein has been provided to you in the form of notes or reports that were included in the Jencks Act material you received on July 9, 2014.

Drug Use

Jack has used the following drugs: cocaine, marijuana, Molly (also known as "ecstasy"), LSD, and mushrooms. Jack began using cocaine regularly in or around 2008, though there would be long periods when he did not use cocaine at all. Jack reports using cocaine on a weekly basis beginning in or around 2010 and ending in or around January, 2013. Jack used cocaine recreationally; he reported that when he used cocaine, he would split an "eight ball" with the defendant, Bebars Baslan. Jack reports that he has not used cocaine in approximately one year. Jack also reports that he has not used any of the other drugs mentioned above since approximately January 2013.

### Prior Arrests

In or around February 2014, Jack was arrested in Brooklyn for beating up an individual named Eric, who lived in Brooklyn and who had reportedly raped Jack's sister. Jack heard that Eric required medical attention after this beating, and that Eric received numerous staples to his face. Although Jack was arrested for assaulting Eric, the charges were ultimately dismissed.

In or around April 2013, Jack was arrested in Brooklyn for shoplifting from the Home Depot. The charge of petit larceny was dismissed.

At some point prior to 2013, Jack was arrested in North Carolina for: driving with an expired license, loitering without money and vagrancy. These charges were dismissed.

When he was 16 or 17 years old, Jack was arrested for purse snatching. This charge was dismissed or sealed as a juvenile record.

A criminal records check indicates that Jack has never been convicted of any crime. See Exhibit A hereto (NCIC report).

### Other Acts

In or around March 2010, when he was 34 years old, Jack began a sexual relationship with his neighbor, A.K. At the time, A.K. was 16 years old. Their relationship lasted approximately 2 months and ended when A.K. went to drug rehabilitation. During this time, Jack took approximately four or five nude images of A.K. At one point during his relationship with A.K., A.K. brought over a friend of hers who was either 16 or 17. Jack had sex with the friend.

During the spring of 2010, Jack began a sexual relationship with J.G. Jack originally met J.G. at a bar in Coney Island, New York. When they first met, J.G. informed Jack that she was 23 years old. Jack later learned that J.G. was only 16 years old. Jack and J.G. had a sexual relationship for approximately 5 months. J.G. was sixteen years old for the first two weeks of this relationship; she turned 17 shortly after their relationship began. During his relationship with J.G., Jack and J.G. made a series of sexually explicit videos. J.G. made the initial videos of herself alone, using a cellular telephone. J.G. then gave those videos to Jack as presents. Jack and J.G. later filmed themselves having sex on approximately 3-4 occasions.

Jack has had sex with prostitutes approximately 20 to 25 times. All of the prostitutes were adults.

Jack has been in a number of physical altercations with other men from the time he was an adolescent the present. Except as noted above, none of these physical

altercations resulted in an arrest or any criminal charges being filed.



The government does not concede the relevance, materiality or admissibility of the enclosed information, but provides it in an abundance of caution.

Please do not hesitate to contact us if you have any questions.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
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cc: Clerk of Court (RJD) (via ECF)